

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	No. S1-4:17CR273 RLW/DDN
NAKIA PHILLIPS,)	
)	
Defendant.)	

GOVERNMENT'S NOTICE AND REQUEST FOR RESTITUTION FOR VICTIM "S.J."

Comes now the United States of America by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Colleen Lang, Assistant United States Attorney for said District, and hereby respectfully requests that the defendant pay restitution to S.J. The actual amount of requested restitution will be determined before sentencing, assuming the defendant is convicted. Evidence in support of the request follows:

Restitution to S.J.

Under 18 U.S.C. § 2259(a), restitution to victims of crime that fall under Chapter 110 is mandatory. The defendant is liable for the full amount of the victim's losses including: medical or psychological care; lost income; transportation; and any other loss suffered by the victim as a proximate result of the offense. "Victim" includes the individual harmed as a result of the commission of a crime under this chapter and/or the guardian of the victim if the victim is under the age of 18 years old.

On June 14, 2017, the Defendant was indicted by a Grand Jury for the Production of

Child Pornography and Sex Trafficking of a Minor. The defendant was re-indicted by the Grand Jury on February 22, 2018, and two more counts of Production of Child Pornography were added. S.J. was the minor victim of the defendant's crime.

S.J.'s mother requested the Government ask for restitution on S.J.'s behalf. As a result of the defendant's crimes, S.J. does and will continue to require psychological counseling on a regular basis. S.J. currently attends counseling. Further, S.J. had medical and hospital expenses as a result of the crimes committed against her by the defendant and will be asking for compensation for those costs. The Government will provide a more detailed calculation of the amount of restitution needed to the defense before sentencing.

Respectfully submitted,
JEFFREY B. JENSEN
United States Attorney

/s/Colleen C. Lang

Colleen C. Lang, #56872MO
Assistant United States Attorney
111 S. Tenth Street, 20th Floor
St. Louis, Missouri 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record. It was also emailed to defense counsel.

s/Colleen C. Lang

Colleen C. Lang, #56872MO

Assistant United States Attorney